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Bethlehem, PA 18020

March 24, 2022

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 12th Street SW  
Washington, DC 20554

**Re: Docket No. 21-232 & No. 21-233, *Protecting Against National Security Threats to the Communications Supply Chain through the Competitive Bidding Program.***

Dear Ms. Dortch,

We write in response to Hikvision's February letter<sup>1</sup>, in particular regarding the relevance of internet connectivity and broadband to its surveillance technology offerings.

**Hikvision Embraces Internet-Connected Surveillance, Except with FCC**

The facts show that Hikvision embraces internet-connected surveillance deployments, despite claiming otherwise to the FCC in multiple filings. Hikvision designs and markets many products for internet use, in line with market trends showing surveillance end-users increasingly value features requiring internet connectivity.

IPVM's previous letter sought to demonstrate this using Hikvision's own globally-disseminated "Top 8 trends for the security industry in 2022"<sup>2</sup> article calling internet use cases "essential." Hikvision argues that IPVM "cherry picks citations" from its literature on 2022 trends. To address this concern, we are submitting here several additional pieces of evidence. Still, it should be noted that our report quoted Hikvision's statements on cloud-based solutions in their entirety, and we appended Hikvision's top 8 trends report in full.

**Hikvision USA's "Top 4 Predictions for 2022 Surveillance Industry Trends"**

In January, 2022, Hikvision USA published its "Top 4 Predictions for 2022 Video Security Industry Trends"<sup>3</sup>, a separate piece from the aforementioned "Top 8 trends" article.

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<sup>1</sup> Hikvision Feb. 23, 2022 Ex Parte at 1. <<https://ecfsapi.fcc.gov/file/102231600520123/2022-02-23%20Hikvision%20Ex%20Parte.pdf>>

<sup>2</sup> *Hikvision*, Jan. 14, 2022. "Top 8 trends for the security industry in 2022." <<https://www.hikvision.com/en/newsroom/blog/top-8-trends-for-the-security-industry-in-2022/>>

<sup>3</sup> *Hikvision USA*, Jan. 11, 2022. "Our Top 4 Predictions for 2022 Video Security Industry Trends." <<https://us.hikvision.com/en/blog/our-top-4-predictions-2022-surveillance-industry-trends>>

One trend was "4G Solar-Powered Security Systems", which Hikvision said "offer a unique, affordable, lightweight, and easy to deploy solution." Another, "Video Management Systems" which provide "peace of mind by enabling you to check into a business from your smartphone or PC from anywhere...you can view multiple business locations conveniently for security, loss prevention, and business operations management without having to spend time and money traveling to each location." (Figure 1) As Hikvision describes them, both applications clearly require an internet connection; on top of this, a 4G system requires broadband. (HikCentral may also be used on internal networks, but without all the benefits Hikvision describes).

Figure 1 - Hikvision USA Top 2022 Trends #3 & #4.

3. **4G Solar-Powered Security Systems:** Crowded urban areas have a very expensive cost of construction and labor for wiring to the large number of buildings and streets. Remote areas such as agricultural and cannabis fields typically do not have access to traditional power and network connections. Yet all these applications require security to protect valuable property and assets. **Security systems powered by 4G cellular connections and solar power** offer a unique, affordable, lightweight, and easy to deploy solution for these applications that had often previously been ignored.
4. **Video Management Systems (VMS):** **VMS such as HikCentral** offer a wide range of analytics features, business intelligence, and peace of mind by enabling you to check into a business from your smartphone or PC from anywhere. By viewing live or recorded video footage in the VMS application, you can view multiple business locations conveniently for security, loss prevention, and business operations management without having to spend time and money travelling to each location. It enables you and your security team to exponentially manage your business and improve efficiency, giving you valuable insights into customer trends, theft and more.

Contact your local Hikvision representative to determine which of our latest security innovations is right for your project. To find your representative, reach out to our inside sales department via email here: [inside.usa@hikvision.com](mailto:inside.usa@hikvision.com).

### **Hikvision USA Launches New 4G Surveillance Product, Widely Marketed, Including to "Telephone Systems Provider"**

In line with its 2022 trends, on March 2nd, 2022, Hikvision announced its new "8 MP 4G Solar-Powered Security System has arrived," which is marketed as working "totally wirelessly."<sup>4</sup>

Hikvision has aggressively promoted the product. For weeks, it has been the main homepage advertisement on Hikvision USA's website. (Figure 2) Hikvision has also promoted the product widely on social media, such as LinkedIn, touting "no wiring needed." (Figures 3, 4 & 5) One notable customer success story shows the product in use by a Florida "telephone systems provider."

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<sup>4</sup> *Hikvision USA*, March 2, 2022. "New 8 MP Solar Kit is Here: Hikvision's Advanced Series for Bigger Projects Enhances Remote Security." <<https://us.hikvision.com/en/blog/new-8-mp-solar-kit-here-hikvisions-advanced-series-bigger-projects-enhances-remote-security>>



Figure 2 - Hikvision USA Homepage on March 8, 2022.

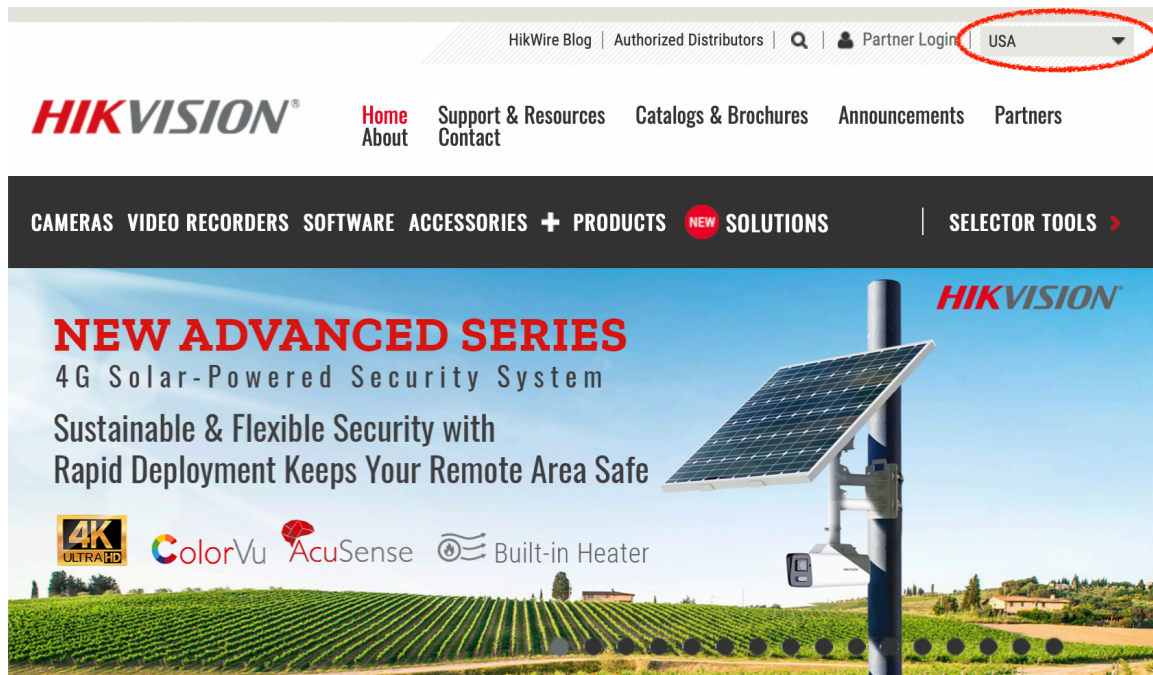


Figure 3 - Hikvision 4G Surveillance Used by "Telephone Systems Provider"

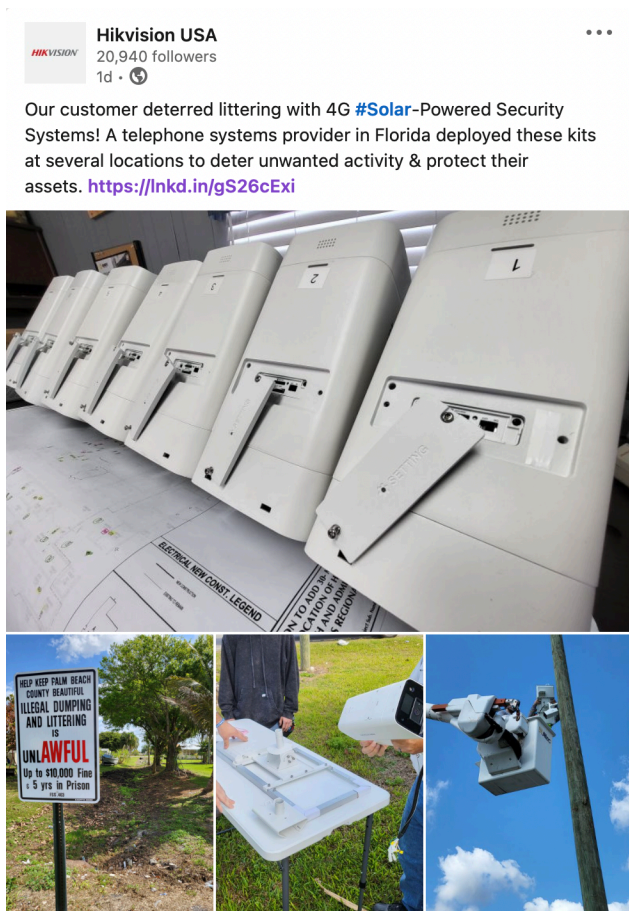


Figure 4 - Hikvision USA Promotes 4G Surveillance for Apartment Complex.

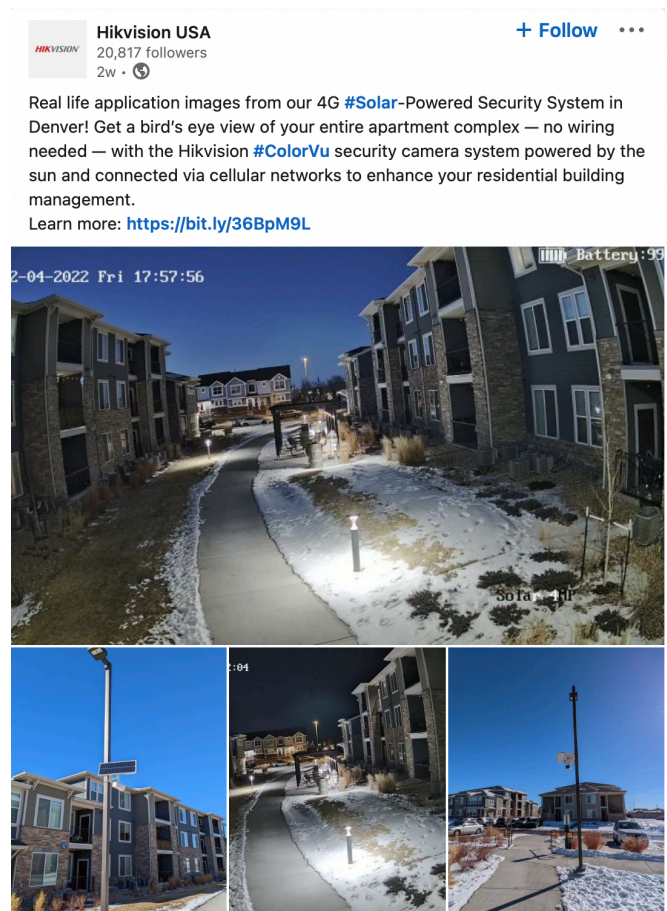




Figure 5 - Hikvision USA Promotes 4G Surveillance for Cheyenne, WY.

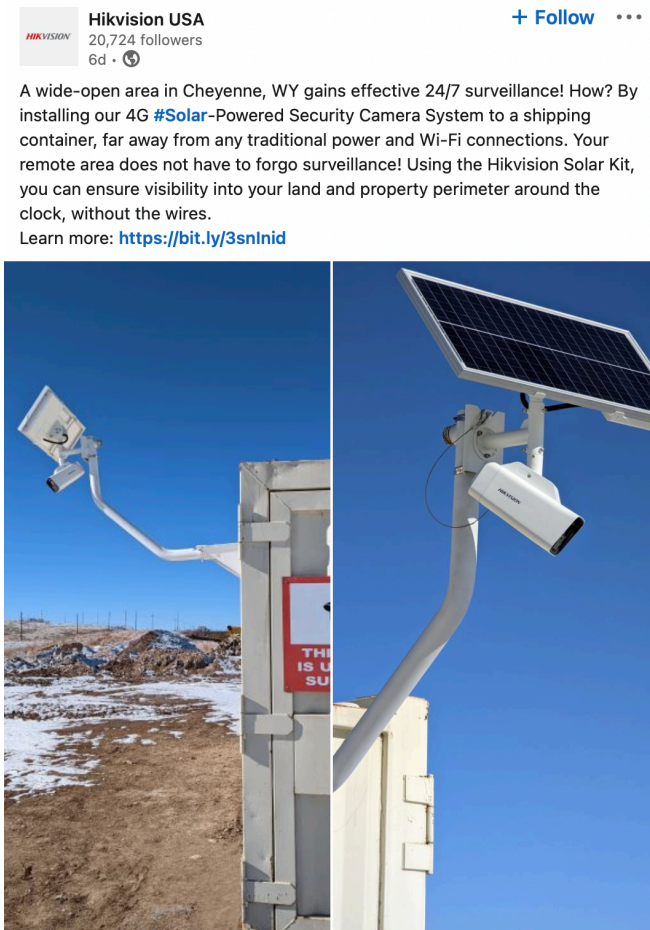


Figure 6 - Hikvision USA Promotes 4G Surveillance White Paper



Furthermore, Hikvision USA published a 6-page white paper on its 4G surveillance technology, which notes, "stakeholders still want to monitor the area and provide surveillance coverage for roads, garbage stations, and perimeters with wireless products." The white paper mentions "4G" eighteen times.<sup>5</sup> A LinkedIn post promoting the white paper asks, "Why use expensive wire cables when you could use 4G solar power instead?" (Figure 6)

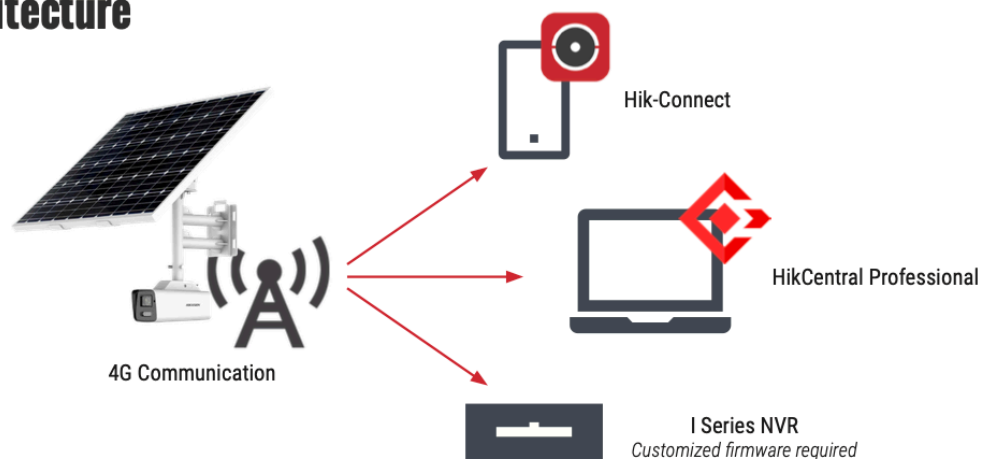
<sup>5</sup> Hikvision USA. "4G Solar Camera Low Power Surveillance Technology." <[https://us.hikvision.com/sites/default/files/manual/4g\\_low\\_power\\_consumption\\_technology\\_white\\_paper.pdf](https://us.hikvision.com/sites/default/files/manual/4g_low_power_consumption_technology_white_paper.pdf)>



A separate information sheet on the new 4G surveillance product<sup>6</sup> includes a "system architecture" infographic prominently marketing the device for use with Hik-Connect. In its original September comment<sup>7</sup>, and latest letter<sup>8</sup>, Hikvision said, "Hikvision advises that access to Hik-Connect should be enabled only if needed," but no such disclosure is made in this document. (Figure 6) We also reviewed numerous company resources pertaining to Hik-Connect, including the product page<sup>9</sup>, the "Hik-Connect Data Sheet"<sup>10</sup>, and Hik-Connect's page on the Apple App Store<sup>11</sup>, and found no such disclosure. All these resources do, however, endorse the benefits of using Hik-Connect.

Figure 7 - Hikvision USA 4G Surveillance System Architecture

## System Architecture



### Hikvision USA's Actions Contradict Statements to FCC

Hikvision's actions show it is well-aware of the demand for internet-connected surveillance, and actively seeks to sell such products in the US. Even during the very same period that Hikvision submitted numerous filings emphasizing the internet-free configurations of its products, the company - specifically, its US subsidiary - was engaged in a months-long effort

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<sup>6</sup> Hikvision USA. "NEW ADVANCED SERIES 4G SOLAR-POWERED SECURITY SYSTEM" <[https://us.hikvision.com/sites/default/files/manual/4k\\_solar\\_4g\\_camera\\_flyer.pdf](https://us.hikvision.com/sites/default/files/manual/4k_solar_4g_camera_flyer.pdf)>

<sup>7</sup> Comments of Hikvision USA, Inc. (Corrected) at 18 (filed Sept. 20, 2021)

<sup>8</sup> Hikvision Feb. 23, 2022 Ex Parte at 4. <<https://ecfsapi.fcc.gov/file/102231600520123/2022-02-23%20Hikvision%20Ex%20Parte.pdf>>

<sup>9</sup> <https://us.hikvision.com/en/products/software/hikvision-app-store/hik-connect>

<sup>10</sup> [https://us.hikvision.com/sites/default/files/data\\_sheet/hik-connect\\_sw\\_101620na.pdf](https://us.hikvision.com/sites/default/files/data_sheet/hik-connect_sw_101620na.pdf)

<sup>11</sup> <https://apps.apple.com/us/app/hik-connect-for-end-user/id1087803190>

to launch a new product in the United States that is not only internet-based, but relies on broadband networks. This is clear evidence of "bad faith" engagement with the Commission.

Sincerely,

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